



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

DEC 02 2010

Tina J. Terrell
Forest Supervisor
Sequoia National Forest
1839 South Newcomb Street
Porterville, CA 93257

Subject: Draft Environmental Impact Statement for Sequoia National Monument
Management Plan, Fresno, Tulare, and Kern Counties, CA (CEQ# 20100291)

Dear Ms. Terrell:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above-referenced project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Forest Service has developed this DEIS to evaluate six alternatives to managing the resources in the Giant Sequoia National Monument. The proposed action (Alternative B) responds to the issues of fuels management and community protection, which were identified during the scoping process. We have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). Our concerns regard direct and cumulative impacts to air quality in an area currently in nonattainment for the National Ambient Air Quality Standards (NAAQS) for ozone and particulate matter, and the Management Plan's deficiency in addressing specific road decommissioning targets. Our detailed comments providing additional information are enclosed.

EPA commends the Forest Service for its efforts to address the many challenges inherent in developing a management plan that responds to both recreational and resource management demands. We especially acknowledge the Forest Service's tribal coordination, which resulted in the development of Tribal Fuels Emphasis Treatment Areas (TFETAs) in response to tribal concerns regarding wildfire, and which is incorporated into a number of the alternatives. We also recognize the climate change analysis (Appendix C) as thorough and current. All alternatives prioritize response to the challenges of climate change, the effects of which are already becoming evident in the Giant Sequoia National Monument.

EPA recognizes that this NEPA process was undertaken to inform programmatic management decisions at the Sequoia National Monument. Future site-specific NEPA documents will address project-level alternatives and environmental impacts. EPA recommends a strong commitment to upfront, site-specific NEPA evaluation for all projects likely to result in

resource impacts. Of special concern are projects which may have water and air quality effects. Likely projects with these types of effects include vegetation management projects to address fuel buildup that puts the Sequoia National Monument at risk from catastrophic fires, and road decommissioning decisions.

We appreciate the opportunity to review this DEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for the project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathleen M. Goforth for".

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures: Summary of EPA Rating Definitions
Detailed Comments

cc: Anne Thomas, Team Leader, Sequoia National Forest
Steve Thompson, California Operations, US Fish and Wildlife Service
Central Valley Regional Water Quality Control Board, Fresno Office
San Joaquin Valley Air Pollution Control District

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
FOR GIANT SEQUOIA NATIONAL MONUMENT MANAGEMENT PLAN, FRESNO, TULARE, AND
KERN COUNTIES, CALIFORNIA, DECEMBER 2, 2010**

Air Quality

The DEIS states that San Joaquin Valley is in Federal non-attainment areas for ozone and particulate matter and is regulated by the San Joaquin Valley Air Pollution Control District (SJAPCD) (p. 192). The proposed alternative includes prioritized management tools for fuels reduction including 1) prescribed fire, 2) mechanical treatments, and 3) managed wildfire (Table 48 p. 154-155). Alternative B proposes future treatment of 11,966 acres of high fire susceptibility forest and 32,291 acres of moderate fire susceptibility forest (Table 3, p. 24). These actions will result in air emissions of ozone precursors, volatile organic compounds (VOCs) and nitrous oxides (NO_x), as well as particulate matter (PM₁₀). In accordance with the Clean Air Act (CAA) General Conformity requirements, a determination must be made that emissions will not exceed the applicable *de minimis* threshold levels for criteria pollutants of concern for projects in federal non-attainment and maintenance areas. If emissions would exceed an applicable *de minimis* threshold, a conformity determination is required to document how the federal action will affect the State Implementation Plan (SIP). Although no emissions will result from the approval of the Management plan, future tiered NEPA documents will need to address CAA General Conformity. As a programmatic document, the FEIS should provide some information regarding expected emissions from future projects, measures the Forest Service can take to reduce emissions, and how the Forest Service will comply with CAA General Conformity requirements. In addition, we note that the air quality impact analysis of the proposed alternatives only includes air impacts from fire and does not include emissions from other sources such as diesel emissions from management activities and road maintenance.

Recommendation:

The FEIS should briefly describe the likely implementation schedule of future fuel treatments, their potential air emissions, measures to mitigate emissions, and generally how the Forest Service expects to comply with CAA General Conformity requirements, including compliance with the SIP and State and local air district regulations. The Air quality analyses should include emissions from all sources, including diesel emissions from mobile sources. These analyses should also include the cumulative air impacts from other projects in Sequoia National Forest.

Transportation System

Decommissioning unused roads in the Forest is important for reducing environmental resource damage. The current designated National Forest Transportation System for the Giant Sequoia National Monument was finalized when the monument was founded in the year 2000, and includes 822 miles of authorized roads, including over 450 miles of roads for Off-Highway Vehicle (OHV) use (p. 400). According to the DEIS, the direction for the past decade has been to encourage decommissioning of roads that are no longer used and are impacting environmental resources. However, very little road decommissioning has been completed while the Forest Service awaits the completion of the Monument plan and updated Transportation plan which will incorporate the 2005 travel management rule (p. 682). Remaining unauthorized motorized routes

(p. 400) and changes proposed in the selected alternative are expected to occur after future site-specific NEPA analyses are completed (p. 678).

The development of the management plan for the national monument provides an opportunity to: 1) define the minimum road network needed for management, 2) develop an implementation plan for addressing existing road-related resource impairments and use conflicts, and 3) move towards the minimum road network within a reasonable period of time. We recognize the funding restraints of Sequoia National Forest, especially given the large deferred maintenance schedule for the past 5 years (p. 404). However, both Sequoia National Forest and EPA believe addressing adverse road-related resource problems is important and should not be addressed only in future project-level planning, as suggested on page 678. While the "minimum transportation system" may vary depending on the different action alternatives, all alternatives should include commitments to decommission roads that are causing negative impacts and are not necessary for administrative needs at the earliest possible opportunity, pursuant to Travel Management Rule direction (36 CFR Part 212 Subpart A). This recommendation is suggested in light of Giant Sequoia National Monument's change in management direction responding to the decline in timber management access needs and greater emphasis on restoring the ecosystem (p. 678).

Recommendation:

In the FEIS, we recommend that an implementation plan be included which identifies the minimum transportation system for each alternative, road decommissioning project priorities, targets based on resource damage, and a schedule for decommissioning unnecessary roads.